

# **Deficiency Status Report 1**

Status Report Submitted: June 29, 2007

**CUPA Name:** Bakersfield Fire Department

**Evaluation Date:** March 6 and 7, 2007

**Next Status Report Due:** September 28, 2007

## **State Evaluation Team:**

*Cal/EPA Team Leader: Kareem Taylor*

*DTSC Evaluator: Mark Pear*

*OES Evaluator: Brian Abeel*

*SWRCB Evaluator: Terry Snyder*

**Based on the CUPA's corrective action responses, the following deficiencies are considered corrected and no further updates are required:**

## **Deficiencies and Corrective Actions**

1. **Deficiency:** The CUPA's Consolidated Permit Program Plan is missing a flow chart describing the Unified Program's permitting procedures.

**Preliminary Corrective Actions:** By June 7, 2007, include a flow chart describing the Unified Program's permitting procedures with the CUPA's Consolidated Permit Program Plan. Submit the flow chart along with the deficiency status report to Cal/EPA.

**CUPA's 1<sup>st</sup> Status Update:** The permit flow chart is attached with the status report email.

2. **Deficiency:** The CUPA's Inspection and Enforcement Plan inspection component is missing two required elements:
  - a. The number of regulated businesses within each program element.
  - b. A schedule of the frequency of inspections to be conducted.

**Preliminary Corrective Actions:** By June 7, 2007, submit the CUPA's revised inspection component that includes the missing elements.

**CUPA's 1<sup>st</sup> Status Update:** The CUPA's Inspection and Enforcement Plan revision is attached with the status report email.

3. **Deficiency:** The CUPA is not sending information pertaining to underground storage tank program using Report 6 on a quarterly basis.

The CUPA has not submitted reports for the last two quarters and only 2 quarterly Report 6s in the last three years.

**Preliminary Corrective Actions:** By March 14, 2007, submit Report 6 for the October – December 2006 quarter and continue to submit Report 6 when due.

**Information Request: Submit Report 6 for the October – December 2006 quarter along with the 1<sup>st</sup> status report to Cal/EPA.**

**CUPA's 1<sup>st</sup> Status Update:** The CUPA's Report 6's have been, and are being submitted.

4. **Deficiency:** The CUPA is not conducting inspections with a frequency that is consistent with its Inspection and Enforcement Plan and with the inspection of other program elements.

**Preliminary Corrective Actions:** By March 7, 2008, and annually thereafter, the CUPA should inspect at least one third (33% per year) of its hazardous waste generator facilities.

Additional resources need to be committed to the generator program within one year.

**CUPA's 1<sup>st</sup> Status Update:** Resource allocation conducted. See attached Document.pdf showing 157 generator inspections conducted past qtr. which is 25% of all generators in the City. This inspection rate exceeds the deficiency correction criteria.

5. **Deficiency:** The CUPA is unable to document that all facilities that have received a notice to comply citing minor violations have returned to compliance within 30 days of notification.

**Preliminary Corrective Actions:** By June 6, 2007, document RTC certifications from owners/operators cited for minor violations with either a re-inspection report or a signed RTC form.

Please submit two recent copies of completed RTC certifications and/or two re-inspection reports along with the deficiency status report to Cal/EPA.

**CUPA's 1<sup>st</sup> Status Update:** RTC Form & PDF file of report showing 2 RTCs is attached with the status report email.

6. **Deficiency:** The CUPA's 2007 area plan does not contain all the required elements. The following elements are missing:

- Training
- Incident Critique and Follow-up

**Preliminary Corrective Actions:** By September 31, 2007, amend the area plan to include those missing elements. And, include this amended area plan with the submission of the 2<sup>nd</sup> deficiency status report.

**CUPA's 1<sup>st</sup> Status Update:** The OES approved Area Plan is attached with the status report email.